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March 8, 2001

VIA FACSIMILE (312) 886-0747 AND**U.S. FIRST CLASS MAIL**

Leverett Nelson, Associate Regional Counsel
United States Environmental Protection Agency
Region 5
77 W. Jackson Blvd. - C14J
Chicago, IL 60604

Re: Schreiber/Caravan Drum site, 3033 Bourke, Detroit, Michigan 48238
Site No. 05PY

Dear Mr. Nelson:

Enclosed herein please find EPA internal documentation received by the undersigned via a freedom of information request, which documents indicate that as of February 25, 1994 the "clean up is complete" and that "This site receives a no further action designation." Given the foregoing, we submit that any costs of the EPA subsequent to that date are clearly erroneous and should be deleted. I hope you find this information helpful in having the EPA auditing department correct the bill previously sent to Schreiber Corporation.

Per our conversation of February 28, 2001, this letter shall also confirm that until such time as a revised bill is sent, no interest or costs will be assessed.

Sincerely,

KERR, RUSSELL AND WEBER, PLC

Kurt R. Vilders

KRV/nef
Enclosure

cc: Chuck Rosa

SITE DESCRIPTION/EXECUTIVE SUMMARY

DUPLICATE
RECORDS CENTER
7TH FLOOR

Site Name and Location

Schreiber/Caravan Drums
3033 Bourke
Detroit, MI 48238

County: Wayne
MDNR District: S.E Michigan
EPA ID: MID985630185

SITE LOCATION

This site is located in the city of Detroit, Wayne County, Michigan. It is bordered to the north by Bourke Avenue and private residences, to the south by the Consolidated Rail Corporation railroad tracks, to the east by a hospital laundry processing facility and to the west by an abandoned automotive spring manufacturing facility.

SITE HISTORY

The site property was operated by the Schreiber Roofing Company from 1980 until 1983 and used primarily as a storage facility for roofing materials and equipment. In 1983, the property was sold to the Caravan Chemical Company which operated the facility as a manufacturer of industrial and commercial surfactants. In 1985, the property was transferred from the Caravan Chemical Company to R.L. Enterprises, which currently operates the facility as a manufacturer of industrial and commercial surfactants.

In 1991, a tar boiler and 14 drums in various stages of decay, some leaking their contents onto the ground, were discovered east of the facility building in a small wooded area. In addition, a 20 foot by 60 foot area of stained soil was located under the leaking drums. Access to the area was slightly restricted with the building wall, and a fence surrounding the site. One side of the fence was cut however, allowing access to the drums.

Samples were collected from the 14 drums and analyzed. Elevated levels of xylene, toluene, naphthalene, benzene, ethyl benzene and PAHs were detected.

In 1992, the US EPA Technical Assistance Team (TAT) oversaw the prp conducted cleanup and remediation at the site. Thirteen drums were staged and overpacked for removal and disposal at a licensed facility. Approximately 1,000 cubic feet of soil was excavated and transported to a local disposal facility. During the contaminated soil removal, 2,500 gallons of aqueous liquids were pumped from the excavation area and transported off-site for treatment and disposal.

Post excavation sampling indicated all areas of contamination were removed and State of Michigan Type B Cleanup Criteria were met. The excavated area was backfilled with clean soil and brought to local grade completing the site removal.

SITE GEOLOGY

The geology of the site consists of a sand and gravel mixture of soil in glacial deposit of unknown depths. Clay layers are interspersed throughout the glacial deposits with bedrock found at approximately one hundred plus feet depths. Both glacial till aquifers and bedrock aquifers are not potable sources of drinking water.

MIGRATION PATHWAYS

The migration pathways of concern were the groundwater pathway and the soil exposure pathway. Area population receives its drinking water from the City of Detroit Municipal Water Supply. The threat to area groundwater was removed with the soil excavation and drum remediation. There are nearby residential homes and a school. Area population was at risk to exposure to contaminants even though the area was completely enclosed by a chain link fence and one wall of the facility building. There was however, a gash in part of the fence which would allow site access by area residents. Since the excavation and drum removal however, this threat no longer exists. This site receives a no further action designation.

2/25/1994



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
MI 955630185

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)

Schreiber-Coravan Drums

02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER

3033 Bourke

03 CITY

Detroit

04 STATE

05 ZIP CODE

06 COUNTY

MI

48238

Wayne

07 COUNTY CODE

82

08 CONG DIST

14

09 COORDINATES LATITUDE

LONGITUDE

10 DIRECTIONS TO SITE (Starting from nearest public road)

III. RESPONSIBLE PARTIES

01 OWNER (if known)

RL Enterprises

02 STREET (Business, mailing, residential)

3033 Bourke

03 CITY

Detroit

04 STATE

05 ZIP CODE

06 TELEPHONE NUMBER

MI

48238

()

07 OPERATOR (if known and different from owner)

(Same as above)

08 STREET (Business, mailing, residential)

09 CITY

10 STATE

11 ZIP CODE

12 TELEPHONE NUMBER

()

13 TYPE OF OWNERSHIP (Check one)

☒ A. PRIVATE ☐ B. FEDERAL

(Agency name)

☐ C. STATE

☐ D. COUNTY

☐ E. MUNICIPAL

☐ F. OTHER

(Specify)

☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☐ A. RCRA 3001 DATE RECEIVED:

MONTH DAY YEAR

☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 d) DATE RECEIVED:

MONTH DAY YEAR

☒ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

☒ YES

DATE

12/19/91

☐ NO

BY (Check all that apply)

☒ A. EPA

☐ B. EPA CONTRACTOR

☐ C. STATE

☐ D. OTHER CONTRACTOR

☐ E. LOCAL HEALTH OFFICIAL

☐ F. OTHER

(Specify)

CONTRACTOR NAME(S):

02 SITE STATUS (Check one)

☒ A. ACTIVE

☐ B. INACTIVE

☐ C. UNKNOWN

03 YEARS OF OPERATION

1980

present

☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Xylene, ethyl benzene, benzene, toluene stored in 14 drums
in wooded area. Drums were in various stages of decay.
Also benzol(b)fluoranthene, benzol(a)pyrene

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Drums leaking unknown contents, stained soil (20'x60')
indicated contamination migration

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)

☐ A. HIGH

(Inspection required promptly)

☐ B. MEDIUM

(Inspection required)

☐ C. LOW

(Inspect on time available basis)

☒ D. NONE

(No further action needed, complete current disposition form)

cleanup complete

VI. INFORMATION AVAILABLE FROM

01 CONTACT

Pete Curria

02 OF (Agency/Organization)

US EPA TAT

03 TELEPHONE NUMBER

313 676-6500

04 PERSON RESPONSIBLE FOR ASSESSMENT

Cindy Fairbanks

05 AGENCY

MDNR

06 ORGANIZATION

ERD

07 TELEPHONE NUMBER

(517) 335-4111

08 DATE

2/25/94

6591-
PA
WA



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
MI 985630185

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply)

- ☐ A. SOLID
☐ B. POWDER, FINES
☐ C. SLUDGE
☐ D. OTHER _____
(Specify)

- ☐ E. SLURRY
☒ F. LIQUID
☐ G. GAS

02 WASTE QUANTITY AT SITE

(Measures of waste quantities must be independent)

TONS _____
CUBIC YARDS 1000
NO. OF DRUMS 14

03 WASTE CHARACTERISTICS (Check all that apply)

- ☒ A. TOXIC
☐ B. CORROSIVE
☐ C. RADIOACTIVE
☐ D. PERSISTENT

- ☒ E. SOLUBLE
☐ F. INFECTIOUS
☐ G. FLAMMABLE
☐ H. IGNITABLE

- ☐ I. HIGHLY VOLATILE
☐ J. EXPLOSIVE
☐ K. REACTIVE
☐ L. INCOMPATIBLE
☐ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE	1000 yd ³		Contaminates were found leaking out of drums onto soil; soil (20'x60') stained, believed contaminated.
SOL	SOLVENTS	14 drums		
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES (See Appendix for most frequently cited CAS Numbers)

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
	xylene		Contents of 14 decayed drums overpacked and removed for proper disposal.		
	ethyl benzene				
	benzene				
	toluene				
	benzo(b)fluoranthene				
	benzo(a)pyrene				
	PNA		removed in 1000 yd ³ of contaminated soil for proper disposal.		
	BTEX				

V. FEEDSTOCKS (See Appendix for CAS Numbers)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS	N/A		FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis reports)

MONR ERD, Pre Remedial Superfund site files on
Schreiber/Caravan Drums, Wayne County



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
MI 985630185

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: None

02 ☐ OBSERVED (DATE: 12/1991)

☒ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

During cleanup, 2500 gals of water removed from site from soil excavation area. Excavated area back filled with clean soil.

01 ☐ B. SURFACE WATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

N/A - None observed.

01 ☐ C. CONTAMINATION OF AIR

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

N/A - None observed

01 ☒ D. FIRE/EXPLOSIVE CONDITIONS

03 POPULATION POTENTIALLY AFFECTED: 100,000

02 ☐ OBSERVED (DATE: 12/1991)

☒ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

Contaminates found in decayed barrels and in soil consist of solvents and BTEX. All were removed from site, cleanup standards for State met.

01 ☒ E. DIRECT CONTACT

03 POPULATION POTENTIALLY AFFECTED: 100,000

02 ☐ OBSERVED (DATE: 12/1991)

☒ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

14 drums leaking into soil found in wooded area outside fenced property of Schreiber/Caravan.

01 ☒ F. CONTAMINATION OF SOIL

03 AREA POTENTIALLY AFFECTED: 1000 yd³

02 ☐ OBSERVED (DATE: 12/1991)

☒ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

Contaminated soil removed for disposal; clean soil used to backfill excavation.

01 ☐ G. DRINKING WATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

N/A - None observed. Area population receives drinking water from City of Detroit municipal supply.

01 ☐ H. WORKER EXPOSURE/INJURY

03 WORKERS POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

N/A - None observed

01 ☐ I. POPULATION EXPOSURE/INJURY

03 POPULATION POTENTIALLY AFFECTED: 100,000

02 ☐ OBSERVED (DATE: 12/1991)

☒ POTENTIAL ☐ ALLEGED

04 NARRATIVE DESCRIPTION

Leaking drums and contaminated soil located outside fenced area of property boundary.



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I IDENTIFICATION

01 STATE 02 SITE NUMBER
MI 985670185

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

N/A- None observed

01 ☐ K. DAMAGE TO FAUNA

04 NARRATIVE DESCRIPTION (include name(s) of species)

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

N/A- None observed

01 ☐ L. CONTAMINATION OF FOOD CHAIN

04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

N/A- None observed

01 ☒ M. UNSTABLE CONTAINMENT OF WASTES

(Spills/runoff/leaking drums)

03 POPULATION POTENTIALLY AFFECTED: 100,000

02 ☐ OBSERVED (DATE: 12/1991)

☒ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

14 leaking drums spilling contents onto soil in unrestricted area.

01 ☐ N. DAMAGE TO OFFSITE PROPERTY

04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

N/A- None observed

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs

04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

N/A- None observed

01 ☒ P. ILLEGAL/UNAUTHORIZED DUMPING

04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: 12/1991)

☒ POTENTIAL

☐ ALLEGED

14 drums dumped behind Schreiber/Caravan facility in wooded area.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None

III. TOTAL POPULATION POTENTIALLY AFFECTED: 100,000 4 mile radius

IV. COMMENTS

US EPA TAT cleanup completed. Excavated area backfilled with clean soil. State of Michigan cleanup standards achieved in past removal sampling.

V. SOURCES OF INFORMATION (Cite specific references, e.g., State files, sample analysis, reports)

MDNR ERD, Pre Remedial Superfund site files on Schreiber/Caravan drums, Wayne County